



STATE OF ARKANSAS  
MIKE BEEBE  
GOVERNOR

July 29, 2013

Ron Curry, Regional Administrator  
United States EPA Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Re: State of Arkansas's concurrence for United States EPA (USEPA) to add the  
MacMillan Ring-Free site to the National Priorities List (NPL)

Dear Mr. Curry:

The State of Arkansas concurs with the USEPA that MacMillan Ring-Free site should be added to the NPL. This site is considered one of Arkansas's priority sites requiring investigation and remediation to mitigate contamination on- and off-site in order to protect human health and the environment.

MacMillan Ring-Free is an abandoned industrial refinery located in Norphlet, Arkansas, in Union County. The facility is bordered by a residential subdivision and the Norphlet Public School on the west, Hayes Creek on the north and east, and Massey Creek and bottom lands associated with the creek to the southwest. MacMillan Ring-Free ceased operations in 1987. The property on which MacMillan Ring-Free operated was inactive from 1987 until 1989, when the property was sold to Nor-Ark Industrial Corp (Nor-Ark) which used the on-site storage tanks for asphalt products until March of 1991, when Nor-Ark filed for bankruptcy. The abandoned refinery was refurbished by Norphlet Chemical as a chemical manufacturing plant in early 2004 to produce tetrafluoroethane (Freon 134A) refrigerant used in automobiles. Norphlet Chemical never operated as intended and failed to produce its intended product. In 2007, the property was once again abandoned and has remained vacant. The site is approximately 100 acres.

The USEPA removal actions occurred at both the McMillan Ring-Free and Norphlet Chemical sites. Total USEPA removal costs to date are in excess of \$8 million dollars. Following the removal action at Norphlet, the site was placed on the State Priority List under the Arkansas Pollution Control and Ecology Commission's Regulation No. 30. The site was listed due to the potential for soil, surface water, and/or ground water contamination on- and off-site and the need to remediate the site to protective

levels. The Arkansas Department of Environmental Quality (ADEQ) conducted a Comprehensive Site Assessment that evaluated remedial alternatives to be implemented at the site, ranging from \$4-to-\$15 million dollars. Due to the large cost of the projected action, ADEQ referred the site to the USEPA for NPL consideration. Sampling results by the USEPA in 2012 indicated contamination of the surface and subsurface soil, ground water, surface water, and sediment. Contaminants of concern include polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), and metals.

The State of Arkansas is committed to working cooperatively with the USEPA and the local community throughout the listing and subsequent Superfund cleanup process. For a fund-financed remedial action prior to initiation of the remedial action, the State of Arkansas agrees to work cooperatively with USEPA in the development of a superfund state contract to provide the State assurances required by CERCLA, including, for example, the State's statutory cost share for the remedial action and responsibility for operation and maintenance activities.

The State of Arkansas concurs with the USEPA for the listing of the MacMillan Ring-Free Site on the NPL. The ADEQ is available to answer questions or provide any additional information you may require. Thank you for your kind consideration of this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Beebe", written over the word "Sincerely,".

Mike Beebe

MB:jb